

Eric H. Horn Esq. (NJ No. 003822005)
David Salhanick, Esq. (NJ No. 041022011)
(admitted *pro hac vice*)
A.Y. STRAUSS LLC
101 Eisenhower Parkway, Suite 412
Roseland, New Jersey 07068
Tel: (973) 287-5006
Email: ehorn@aystrauss.com
*Attorneys for Defendant Zariz Transport, Inc.
and Yaakov Guzegul*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DOREMUS LAND 672, LLC,

Plaintiff,

v.

ZARIZ TRANSPORT, INC. and
YAAKOV GUZEGUL

Defendants

DOCKET NO.: 2:23-cv-02850

**Oral Argument Requested Pursuant to
L. Civ. R. 78.1(b)**

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that on Monday, October 16, 2023 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants shall move before the Honorable Esther Salas, U.S.D.J. at the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102, for an Order dismissing Plaintiff's Complaint for failure to state a claim upon which relief may be granted, pursuant to Fed. R. Civ. P. 12(b)(6), and based on Plaintiff's lack of standing, pursuant to Fed. R. Civ. P. 12(b)(1),

PLEASE TAKE FURTHER NOTICE that in support of this motion Defendants shall rely upon the accompanying Brief, Declaration of David Salhanick with attached exhibits, and Declaration of Yaakov Guzelgul with attached exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

A.Y. STRAUSS, LLC.

Attorneys for Defendants

By: /s/ Eric Horn
Eric H. Horn
David Salhanick (admitted *pro hac vice*)

Dated: September 18, 2023